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OF NEW YORK, INC.**

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June 7, 2023

BY ECF

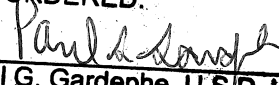
The Honorable Paul G. Gardephe
Southern District of New York
United States Courthouse
40 Foley Square, Rm. 705
New York, New York 10007

Re: **United States v. Daniel Bertini**
23-CR-0061 (PGG)

MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

Dated: June 8, 2023

Dear Judge Gardephe:

Daniel Bertini, through undersigned counsel, respectfully submits this letter in support of his request to modify the terms of his pretrial release. Currently, Mr. Bertini is authorized to work out at the Chelsea Recreation Center -- located at 430 W. 25th Street, New York, NY 10001 -- Tuesday through Thursday from 8:00 a.m. to 9:30 a.m. *See* Doc. 13. Recently, however, Mr. Bertini has started a full-time job, which has rendered this work out schedule impractical. Accordingly, Mr. Bertini asks the Court to amend its previous order as follows:

Mr. Bertini is authorized to work out at the Chelsea Recreation Center -- located at 430 W. 25th Street, New York, NY 10001 -- four days per week for 1.5 hours per session. The days of the week that Mr. Bertini works out and the start times for those sessions shall be left to pretrial services' discretion.

Undersigned counsel has conferred with pretrial services and the government about this request.

Pretrial services has no objection and the government defers to pretrial services.

Respectfully Submitted,

/s/

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Cc: United States Pretrial Services Officer Francesca Piperato (via email);
Assistant United States Attorneys Jonathan Bodansky (via ECF)